

THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

RE: Dennis D. Miller  
Shirley S. Miller  
Debtor(s)

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CHAPTER 13  
CASE NO. 21-61325

MOTION TO EXTEND AUTOMATIC STAY

The Debtor(s), by Counsel, pursuant to Bankruptcy Code Section 362 and state as follows:

1. That on **December 10, 2021**, the Debtor(s) filed in this Court a Petition under Chapter 13 of the US Bankruptcy Code.
2. The Debtor's previous bankruptcy cases are as follows:  
(List all cases, filing date, Chapter, status and date of discharge or dismissal)  
***19-61089, Filed 05/17/2019, Chapter 13, Dismissed 12/11/2020***  
***07-60551, Filed 03/30/2007, Chapter 13, Dismissed 02/20/2009***  
***99-01553, Filed 05/20/1999, Chapter 7, Discharged 08/24/1999***
3. Due to the dismissal of the previous case, the automatic stay will expire 30 days after the date of filing this new petition. The Debtor(s) is requesting that the Court extend the automatic stay for the following reason(s). ***The Debtor(s) previous case was dismissed due to the following circumstance(s): The male debtor lost his job in 2020. He worked for a temporary agency for less salary and was unable to make bankruptcy trustee payments. He has since started a full-time job with steady income working 40 hours a week. The debtors feel they will be successful in their new case and their new Chapter 13 plan is feasible for their budget.***
4. **WHEREFORE**, your Debtor(s) prays that the Court, after notice and an opportunity for hearing enter an Order extending the automatic stay until such time the Court deems otherwise.

Dated: 12/17/2021

By: /s/ Stephen E. Dunn  
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**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA**

IN RE: Dennis D. Miller  
Shirley S. Miller  
Debtor(s)

CHAPTER 13  
CASE NO. 21-61325

**NOTICE OF HEARING ON DEBTORS' MOTION TO EXTEND AUTOMATIC STAY**

Please take notice that the above-named Debtor(s) has filed a Motion to Extend the Automatic Stay, a true copy of which are attached hereto, and shall submit the same to the Rebecca B. Connelly, Bankruptcy Judge, for approval on **January 5, 2021 at 9:30 a.m.**, or as soon thereafter as the parties may be heard by video conferencing via Zoom URL: <https://vawb-uscourts-gov.zoomgov.com/j/1603692643>; Meeting ID 160 369 2643.

Objections to said Motion to Extend the Automatic Stay must be filed in writing, with copies thereof served on the Trustee and Counsel for the Debtor more than three (3) days before the date of the hearing as set forth above. The failure to file a response by this deadline may result in the Court treating the Motion as uncontested, entering an order granting the Motions prior to the hearing date and canceling the hearing described in this Notice.

I do hereby certify that a copy of this Notice and Motion have been sent to the Chapter 13 Trustee by ECF Mail, to the Debtors and all creditors by first class postage prepaid mail in this case on the after mentioned date.

Dated: 12/17/2021

Dennis D. Miller  
Shirley S. Miller

/s/ Stephen E. Dunn  
Of counsel

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